

1 S. Ryan Patterson (State Bar No. 279474)  
2 WILSON, ELSER, MOSKOWITZ,  
3 EDELMAN & DICKER LLP  
4 555 S. Flower Street, Suite 2900  
5 Los Angeles, CA 90071  
6 Telephone: (213) 443-5100  
7 Facsimile: (213) 443-5101  
8 Email: ryan.patterson@wilsonelser.com

9 Attorneys for Defendant Quizlet, Inc.

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

12 Case No.: 2:25-MC-10

13 **DEFENDANT QUIZLET INC.'S**  
14 **NOTICE OF MOTION TO QUASH**  
15 **PLAINTIFF'S DMCA § 512(h)**  
16 **SUBPOENA**

17 In the Matter of the Application of  
18 Barkley & Associates Inc.

19 *[Filed concurrently with Motion.*  
20 *Declaration of S. Ryan Patterson and*  
21 *[Proposed] Order]*

22 TO PLAINTIFF BARKLEY & ASSOCIATES, INC., AND ITS COUNSEL  
23 OF RECORD:

24 PLEASE TAKE NOTICE that, on \_\_\_\_\_, 2025 at \_\_\_\_\_, or as soon  
25 thereafter as the attorneys for the parties may be heard in Courtroom \_\_\_\_\_  
26 of the above named Court, the undersigned attorneys for Defendant Quizlet, Inc.,  
27 will, and hereby does, move the Court for an Order quashing the subpoena  
28 purportedly issued under the Digital Millennium Copyright Act ("DMCA") §  
512(h) by Barkley & Associates, Inc., and served on March 5, 2025.

1 This motion is based on this notice of motion, the separate memorandum of  
2 points and authorities, and declaration of Ryan Patterson concurrently filed  
3 herewith, the papers, pleadings, and records on file herein, and upon such other  
4 evidence, both oral and documentary, as may be presented at the hearing on this  
5 motion.

6 This motion is made following the conference of counsel pursuant to Local  
7 Rule 7-3, which took place on March 18, 2025, between counsel for Plaintiff and  
8 counsel for Defendant.

9  
10 March 19, 2025

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP**

12 /S. Ryan Patterson/  
13 S. Ryan Patterson  
14 Attorneys for Defendant Quizlet, Inc.